



State of Louisiana
Department of Health and Hospitals
Office of the Secretary

May 10th, 2011

Glenn T. Cambre, Director
Center for Environmental Health Services
Office of Public Health
Department of Health and Hospitals
628 N. 4th Street
P.O. Box 4489
Baton Rouge, Louisiana 70821-4489

Re: Letter of Intent – Use of Large Capacity Grease Interceptors

Dear Mr. Cambre:

It has come to my attention that the LDHH Office of Public Health has recently received inquiries relating to the use of large capacity grease interceptors in lieu of a grease trap. More specifically, the subject of these inquiries has been in regard to the prospect of utilizing a grease interceptor which meets or exceeds the minimum required capacity for grease traps as covered in Section M104.2 of the Louisiana State Plumbing Code, 2000 edition (LSPC). The terms “grease trap” and “grease interceptor” are defined in Chapter 2 and Appendix D of the LSPC as follows:

Grease Interceptor – an interceptor of less than 125 gallon capacity which is designed and installed so as to separate and retain grease and which is generally installed indoors entirely above grade.

Grease Trap – an interceptor of at least 125 gallon capacity which is designed and installed so as to separate and retain grease and which is generally installed below grade outdoors with provisions for above grade accessibility for cleaning purposes.

LSPC, Section M104.2.1 recommends grease traps to be designed large enough so that they require cleaning at a frequency of no more often than once per month. It is my understanding, based upon your staff’s research and recommendations that grease traps typically have a much larger liquid holding capacity than do grease interceptors rated to serve an identical flow rate or number of drainage fixture units. Because of the smaller holding capacity, grease interceptors typically require much more frequent cleanings to remove the retained grease and to prevent such from entering the sewerage collection and treatment system. Per the Plumbing and Drainage Institute (PDI) Standard PDI-G101 - Testing and Rating Procedure for Hydro Mechanical Grease Interceptors, Section 8.1.1 (Sizing Considerations), *the larger the interceptor the higher the flow rate it will handle efficiently with a greater quantity of grease retained before cleaning is required.*

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The liquid capacity of a grease interceptor is currently specified in the LSPC as having less than 125 gallon capacity. I have been made aware that the PDI-G101 Standard currently referenced in Chapter 14 and Appendix D of the LSPC has recently been expanded to include larger grease interceptors. It has also been brought to my attention that there are grease interceptors which comply with either PDI-G101 or ASME A112.14.3 (Grease Interceptors) that have a liquid holding capacity of at least 125 gallons or more meeting the size requirements of LSPC Section M104.2. Because these *large capacity grease* interceptors are available in sizes that can provide the same liquid holding capacity as required for grease traps it is my intent to allow the use of large capacity grease interceptors in lieu of grease traps when the following stipulations are met:

New Definition:

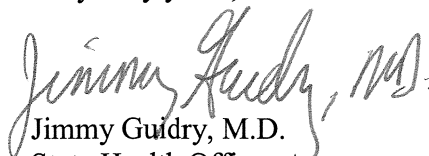
Large Capacity Grease Interceptor – a grease interceptor with a minimum 125 gallon capacity which typically incorporates air entrainment, hydromechanical separation, and interior baffling in combination or separately, which is installed in sanitary drainage systems to intercept and retain fats, oils and grease from waste water discharge.

1. Large capacity grease interceptors shall be evaluated, tested, and certified for conformance with the latest edition of PDI-G101 or ASME A112.14.3.
2. Large capacity grease interceptors shall be sized to provide the minimum liquid holding capacity required for a grease trap in accordance with Sections M104.2.1 through M104.2.3 of the LSPC.
3. Large capacity grease interceptors shall not be utilized to serve the waste lines from garbage grinders.
4. In addition to the specifications contained in this document, the installation of large capacity grease interceptors shall be performed in strict accordance with the requirements of PDI-G101, ASME A112.14.3, the LSPC, and the manufacturer's installation instructions. In instances where there are conflicts between the requirements, the more stringent provisions shall prevail.

Please note the undersigned is the co-state "Plumbing Official", as that term is defined in the LSPC, and that the decision contained within this letter does not abdicate the user's or installer's responsibility to obtain approval from the co-local "Plumbing Official".

Please ensure that copies of this letter are circulated to your staff and others as appropriate. Should questions arise, they should be directed to Mr. Jake Causey, P.E., Chief Engineer, Engineering Services Section, Center for Environmental Health Services, Office of Public Health. Mr. Causey may be reached at (225) 342-7499.

Very truly yours,


Jimmy Guidry, M.D.
State Health Officer

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JG//JKC/JKH/jkh

cc: Jake Causey, Chief Engineer, Engineering Services Section, CEHS, OPH
Jeremy Harris, Engineer, Engineering Services Section, CEHS, OPH
District/Regional Engineers, Engineering Services Section, CEHS, OPH
Tenney Sibley, Chief Sanitarian, Sanitarian Services Section, CEHS, OPH
Sidney Becnel, Legislative Liaison & Rulemaking Manager, CEHS, OPH
State Plumbing Board of Louisiana c/o John Barker, Executive Director
State Licensing Board for Contractors c/o Michael McDuff, Executive Director
H. "Butch" Browning, Jr., State Fire Marshal, Office of the State Fire Marshal, Department
of Public Safety and Corrections
Joe DeLaune, Architect, Chief Building Official, Building Official Plan Review Division, Office of the
State Fire Marshal, Department of Public Safety and Corrections
Louisiana State Uniform Construction Code Council c/o Denise C. Jobe, Administrator, c/o Office of
Management and Finance, Department of Public Safety and Corrections
Louisiana Professional Engineering and Land Surveying Board c/o Donna D. Sentell, Executive Secretary
Louisiana Engineering Society c/o Brenda Gajan, Executive Director
Louisiana Board of Architectural Examiners c/o Mary "Teeny" Simmons, Executive Director
AIA Louisiana c/o Lynn B. Robertson, Executive Director
American Society of Plumbing Engineers, New Orleans Chapter, c/o Richard Molina
Local Plumbing Inspectors (from S. Becnel's Excel list)

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STATE OF LOUISIANA
DEPARTMENT OF PUBLIC SAFETY
OFFICE OF THE STATE FIRE MARSHAL